

# EXHIBIT 6

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4 \_\_\_\_\_ )  
5 WAYMO LLC, )  
6 Plaintiff, )  
7 vs. ) Case No.  
8 UBER TECHNOLOGIES, INC., ) 3 :17-cv-00939-WHA  
9 OTTOMOTTO LLC; OTTO )  
10 TRUCKING LLC, )  
11 Defendants. )  
12 \_\_\_\_\_ )  
13  
14  
15 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
16 VIDEOTAPED DEPOSITION OF MICHAEL JANOSKO  
17 San Francisco, California  
18 Thursday, March 23, 2017  
19 Volume I  
20  
21  
22  
23 Reported by: SUZANNE F. GUDELJ  
24 CSR No. 5111  
25 Job No. 2575504  
26 PAGES 1 - 32

1 layer connection so that data in transit is  
2 encrypted. And beyond that, I -- I'm not exactly  
3 sure.

4 Q When Tortoise SVN connects to the Waymo  
5 SVN, is a local copy of the SVN downloaded onto the 03:26:24  
6 computer that's accessing the Waymo SVN?

7 A My understanding is that you can select  
8 folders to replicate, and that replication includes  
9 some local -- local storage.

10 Q When you use the term "replicate," are you 03:26:53  
11 referring to replicating a copy onto the local  
12 computer or replicating the database -- I'm not  
13 exactly sure what you mean by replicate because you  
14 said it entails some local storage, implying that  
15 some replication does not include local storage. 03:27:15

16 A So I'll try to restate that. The -- my  
17 understanding of how subversion clients work is that  
18 you can select a source code version and separate  
19 folders, individual folders or projects. I don't  
20 know how they're grouped, what the terminology is. 03:27:34  
21 And you choose which ones to download a local copy  
22 of, and then you can modify them and then upload  
23 them again. And that's how the source code  
24 versioning works.

25 As you make edits and modifications, those 03:27:51

1 position to download an entire copy of the Waymo SVN  
2 repository to his local computer?

3 MR. PERLSON: And I caution you not to  
4 reveal any discussions you've had with counsel in  
5 answering that question.

03:38:59

6 THE WITNESS: Sure. Sure. I'm not  
7 familiar enough with Anthony's role to -- to say  
8 whether that was unusual or not.

9 BY MS. CHANG:

10 Q If a Waymo employee downloads an entire  
11 copy of the Waymo SVN repository to their local  
12 computer, is that an action that would be  
13 investigated by the security team at Google or  
14 Waymo?

03:39:11

15 MR. PERLSON: Object to form.

03:40:20

16 THE WITNESS: I don't think so.

17 BY MS. CHANG:

18 Q Why would you say "I don't think so"?

19 A Generally the action -- so the actions  
20 around data access around -- that -- that someone  
21 has legitimate and job-related access to, those are  
22 investigated when there's other evidence of -- of  
23 malicious activity or -- or activity that -- that  
24 feels suspect.

03:40:48

25 Q Are you aware that a number of former Waymo 03:41:10

1 Q Are you aware of any evidence that Uber is  
2 using any of Waymo's trade secrets?

3 MR. PERLSON: Objection. Form.

4 THE WITNESS: I'm not.

5 BY MS. CHANG: 03:42:27

6 Q Are you aware of any evidence that Otto is  
7 using any of Waymo's trade secrets?

8 MR. PERLSON: Objection to form.

9 BY MS. CHANG:

10 Q And by Otto, I'm referring to Ottomotto LLC 03:42:35  
11 and Otto Trucking LLC?

12 A Right. Just circumstantial, that kind of  
13 knowledge. So again, kind of via the media.

14 Q Are you aware of any evidence that Otto is  
15 using any of Waymo's trade secrets? 03:42:50

16 MR. PERLSON: Objection to form.

17 THE WITNESS: No.

18 MS. CHANG: Can we go off the record.

19 VIDEO OPERATOR: Going off the record at  
20 3:43 p.m. 03:43:07

21 (Recess.)

22 VIDEO OPERATOR: We're back on the record  
23 at 3:50 p.m.

24 MR. PERLSON: Before we start, can I mark  
25 this transcript Highly Confidential, Attorneys' Eyes 03:50:14